

October 28, 2004

Regulatory Analysis and Development  
PPD, APHIS, Station 3C71  
4700 River Rd, Unit 118  
Riverdale, MD 20737-1238

RE: Docket 98-106-4  
Animal Welfare; Regulations and Standards for Birds, Rats and Mice

Dear Sir:

The Association of American Medical Colleges (AAMC) welcomes the opportunity to comment on Docket No. 98-106-4, in which the Agency is seeking comments to determine how it should regulate the care and use of rats, mice, and birds not bred for research.

The AAMC represents the nation's 125 accredited medical schools, nearly 400 major teaching hospitals, more than 105,000 faculty in 94 professional and scientific societies, and the nation's 66,000 medical students and 97,000 residents. More than half of the extramural research funding awarded by the National Institutes of Health goes to medical schools and their affiliated teaching hospitals. Much of this research involves the use of laboratory animals. As such, the Association has a long history of involvement in legislative and regulatory issues concerning the use of animals in research and has a strong commitment to the humane care and treatment of laboratory animals.

The AAMC has reviewed the detailed comments of the National Association for Biomedical Research (NABR) on this notice and we strongly support their position. The current regulatory regime for rats, mice, and birds not bred for research is adequate and there is no reasonable need for further regulation.

We would like to highlight several of NABR's recommendations.

We share NABR's view that the general standards in subpart F of part 3 of the Department's existing regulations are adequate to provide for the humane handling, care, treatment, and transportation of birds. Rather than developing specific standards for the nearly 10,000 species of birds, a more advisable approach is the one advocated by NABR, "to use the general standards contained in subpart F and then reference existing standards of societies and associations that have recognized expertise in the care, management and transportation of birds." We share NABR's view that this would allow "for

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more specific standards of care when appropriate, and would also permit greater flexibility in adhering to the appropriate level of care as standards agreed upon by experts are revised and updated.”

In light of the relatively small number of birds not bred for research used by research institutions and the extraordinarily large number of bird species, we share NABR’s view that developing specific regulatory standards for birds is not feasible nor is it prudent, and would provide an inordinate drain on APHIS resources.

Lastly, we believe that rats and mice not bred for research should continue to be regulated under the general standards in subpart F of part 3. Like NABR, we believe this regulatory framework has worked well over the years and will continue to work well for the foreseeable future.

We appreciate the opportunity to comment on this ANPR. If you have any questions or would like additional input, do not hesitate to contact Tony Mazzaschi in the AAMC Division of Biomedical and Health Sciences Research.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan J. Cohen". The signature is fluid and cursive, with the first name "Jordan" being more prominent than the last name "Cohen".

Jordan J. Cohen, M.D.